

Employee Post-Travel Disclosure of Travel Expenses

Date/Time Stamp:
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SECRETARY OF THE SENATE
PUBLIC RECORDS
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Post-Travel Filing Instructions: Complete this form within 30 days of returning from travel. Submit all forms to the **Office of Public Records in 232 Hart Building.**

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

- ☐ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**
☐ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

Private Sponsor(s) (list all): Stanford University's Hoover Institution

Travel date(s): 4/3/18 - 4/5/18

Name of accompanying family member (if any): N/A

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING DID NOT INCREASE DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate	\$567.82 Round-trip	\$320	\$131.67	\$164.85 Ground Transportation
<input checked="" type="checkbox"/> Actual Amount	airfare			

Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate	N/A	N/A	N/A	N/A
<input type="checkbox"/> Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.):

See attached Agenda

4/30/18

(Date)

Elizabeth Oberan

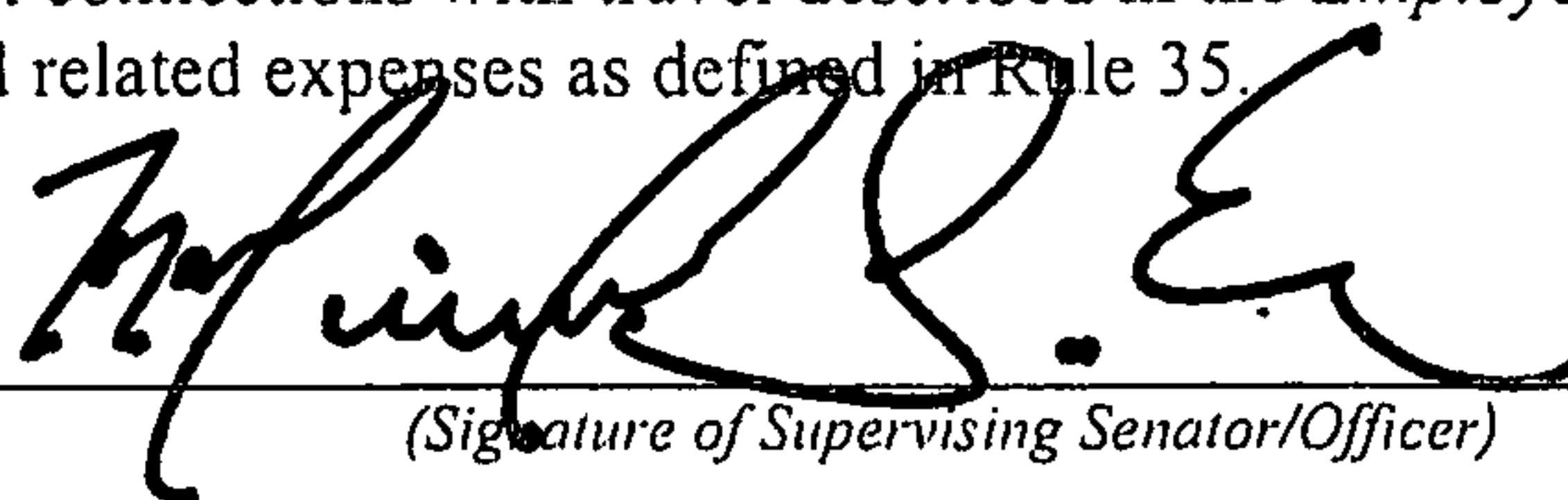
(Printed name of traveler)



(Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.



(Signature of Supervising Senator/Officer)

(Date)

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors): Stanford University's Hoover Institution
2. Description of the trip: An intensive program for congressional staff which consists of three days of seminars, simulations, and keynote presentations.
3. Dates of travel: 04/03/2018 - 04/05/2018
4. Place of travel: Stanford University, Palo Alto, CA
5. Name and title of Senate invitees: See attached list
6. I *certify* that the trip fits one of the following categories:
 - ☐ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
 - OR -**
 - ☒ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
 - AND -**
 - ☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I *certify* that:
 - ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
 - AND -**
 - ☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

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9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

OR

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (see questions 6 and 10).

OR

☒ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

Stanford University's Hoover Institution solely planned all aspects of the trip, including topics to be

discussed, travel/accomodation logitistics, and required paperwork. Hoover employees will also be

responsible for traveling with congressional staff and managing logistics for the duration of the trip.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

The Hoover Institution is a research institution that seeks to improve the human condition by advancing

ideas the promote economic opportunity and prosperity while securing and safeguarding the peace

through its world renowned scholars, library and archives, as well as by engaging Congress and its staff.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

This is the fourth sponsored trip for congressional staff organized by the Hoover Institution. The latest of

which was in August of 2017 and had a similar format as this trip.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

Stanford University's Hoover Institution regularly sponsors policy panels and roundtables for think tank scholars, journalists, congressional staff, Executive branch officials, academics and members of the general public.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate	\$600 Roundtrip coach airfare	\$320 Total (\$160/night)	\$160 total (\$64 per diem)	n/a
<input type="checkbox"/> Actual Amounts	\$400 Ground transportation			

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

This trip is arranged/organized specifically for congressional participation.

18. Reason for selecting the location of the event or trip

In order to have a significant number of Hoover senior fellows participate in the event, we are hosting at the Hoover Institution's headquarters on the Stanford University campus.

19. Name and location of hotel or other lodging facility:

Stanford Guest House, 2575 Sand Hill Road, Menlo Park, CA 94025

20. Reason(s) for selecting hotel or other lodging facility:

Stanford Guest House is owned and operated by Stanford. it is in close proximity to the events that comprise the program

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21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

All lodging, meals, and other expenses are within the official federal government travel per diem rate for

Palo Alto, CA

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Stanford University's Hoover Institution will provide coach-class round-trip airfare between D.C. and

San Francisco, and round-trip ground transportation between Stanford University and SFO airport.

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

None

25. I hereby *certify* that the information contained herein is true, complete and correct. (You must include the completed signature block below for each travel sponsor.):

Signature of Travel Sponsor: _____

Name and Title: Michael G. Franc, Director of Washington, D.C. Programs

Name of Organization: Hoover Institution

Address: 1399 New York Avenue, NW Suite 500, Washington, D.C. 20005

Telephone Number: 202-760-3200

Fax Number: 202-760-3191

E-mail Address: mfranc@stanford.edu

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EMPLOYEE PRE-TRAVEL AUTHORIZATION

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics** in SH-220. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Elizabeth Oberan

Employing Office/Committee: Senator Mike Lee

Private Sponsor(s) (list all): Stanford University's Hoover Institution

Travel date(s): 04/03/2018-04/05/2018

*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*

Destination(s): Stanford University, Palo Alto, CA

Explain how this trip is specifically connected to the traveler's official or representational duties:

I handle judiciary issues for Senator Lee including cybersecurity and certain legal aspects of foreign relations. This conference addresses these issues.

Name of accompanying family member (if any): n/a

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

2/28/18

(Date)

Elizabeth Oberan

(Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Senator Mike Lee hereby authorize Elizabeth Oberan
(Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

2/28/18

(Date)

Mike Lee

(Signature of Supervising Senator/Officer)



Ideas Defining A Free Society

Michael G. Franc
Director of Washington, D.C. Programs

Dear Ms. Oberan,

We are pleased to inform you that you have been selected to attend the Hoover Institution's Stuart Family Congressional Fellowship Program, which takes place on the Stanford University campus in Palo Alto from April 3-5, 2018.

This year had an overwhelming number of qualified candidates, however your submission was exceptional among the many that we received, and we are excited to have you join us. **To proceed, please notify Andrew Clark (afclark@stanford.edu) of your agreement to attend by the close of business on Tuesday, February 27.**

Once confirmed, you will need to complete the necessary ethics paperwork. In this packet, you will find the necessary forms to be submitted to your ethics committee. This packet includes:

- Employee Pre-travel Authorization Form (*For you to fill out*)
- Private Sponsor Travel Certification Form
- Agenda & Flight Itinerary
- Copy of Sponsor Invitation

You will need to fill out the Employee Pre-Travel Authorization Form and **submit this entire packet to your Ethics Committee for review by Friday, March 2nd**. Upon submission, please notify Andrew Clark at afclark@stanford.edu.

The Congressional Fellowship will take place from April 3rd through April 5th. Plan to depart from Washington, D.C. the morning of April 3rd and return the afternoon of April 5th. Finally, be sure to review all the action items and deadlines in the attached document titled "Next Steps."

Should you have any questions, don't hesitate to reach out. Again, thank you for your participation. We look forward to welcoming you to Stanford University and expect an excellent program.

Sincerely,

Michael G. Franc
Director, Washington D.C. Programs
Hoover Institution, Stanford University

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Stuart Family Congressional Fellowship - April 2018
Stanford University
Palo Alto, CA

Group Flight Information:

Outbound flight: April 3, 2018
Flight Number - UA 2042
Departure Airport - DCA
Departure Time - 7:50am
Arrival Airport - SFO
Arrival Time - 10:56am

Return Flight: April 5, 2018
Flight Number - UA 517
Departure Airport - SFO
Departure Time - 4:15pm
Arrival Airport - IAD
Arrival Time - 12:15am

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

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The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors): Stanford University's Hoover Institution
2. Description of the trip: An intensive program for congressional staff which consists of three days of seminars, simulations, and keynote presentations.
3. Dates of travel: 04/03/2018 - 04/05/2018
4. Place of travel: Stanford University, Palo Alto, CA
5. Name and title of Senate invitees: See attached list
6. I *certify* that the trip fits one of the following categories:
 - ☐ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
 - OR –
 - ☒ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
 - AND –
 - ☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I *certify* that:
 - ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
 - AND –
 - ☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

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9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

— OR —

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10*).

— OR —

☒ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

Stanford University's Hoover Institution solely planned all aspects of the trip, including topics to be

discussed, travel/accomodation logististics, and required paperwork. Hoover employees will also be

responsible for traveling with congressional staff and managing logistics for the duration of the trip.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

The Hoover Institution is a research institution that seeks to improve the human condition by advancing

ideas the promote economic opportunity and prosperity while securing and safeguarding the peace

through its world renowned scholars, library and archives, as well as by engaging Congress and its staff.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

This is the fourth sponsored trip for congressional staff organized by the Hoover Institution. The latest of

which was in August of 2017 and had a similar format as this trip.

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15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

Stanford University's Hoover Institution regularly sponsors policy panels and roundtables for think tank scholars, journalists, congressional staff, Executive branch officials, academics and members of the general public.

16. Total Expenses for Each Participant:

		Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate		\$600 Roundtrip coach airfare	\$320 Total (\$160/night)	\$160 total (\$64 per diem)	n/a
<input type="checkbox"/> Actual Amounts		\$400 Ground transportation			

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

This trip is arranged/organized specifically for congressional participation.

18. Reason for selecting the location of the event or trip

In order to have a significant number of Hoover senior fellows participate in the event, we are hosting at the Hoover Institution's headquarters on the Stanford University campus.

19. Name and location of hotel or other lodging facility:

Stanford Guest House, 2575 Sand Hill Road, Menlo Park, CA 94025

20. Reason(s) for selecting hotel or other lodging facility:

Stanford Guest House is owned and operated by Stanford. it is in close proximity to the events that comprise the program

- (21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

All lodging, meals, and other expenses are within the official federal government travel per diem rate for

Palo Alto, CA

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21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

All lodging, meals, and other expenses are within the official federal government travel per diem rate for

Palo Alto, CA

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Stanford University's Hoover Institution will provide coach-class round-trip airfare between D.C. and San Fransisco, and round-trip ground transportation between Stanford University and SFO airport.

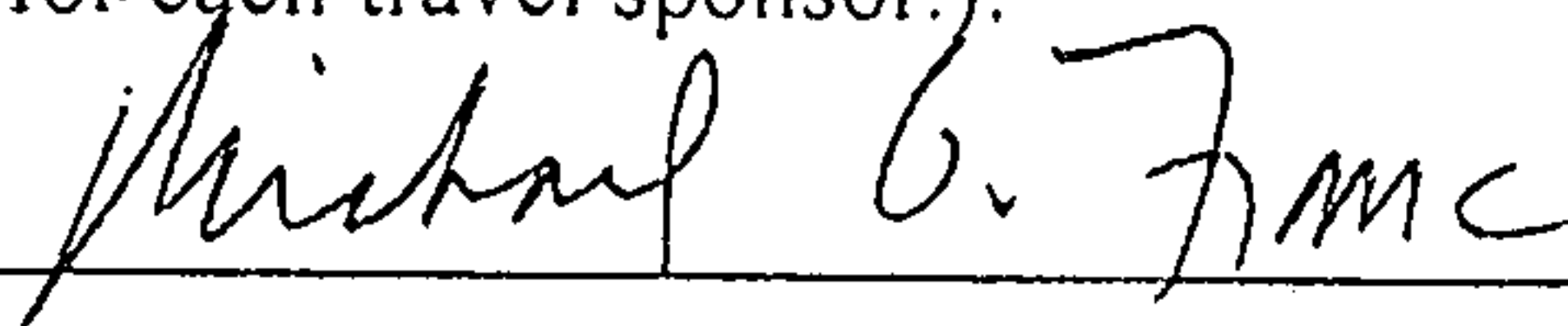
23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

None

25. I hereby *certify* that the information contained herein is true, complete and correct. (You must include the completed signature block below for each travel sponsor.):

Signature of Travel Sponsor:



Name and Title: Michael G. Franc, Director of Washington, D.C. Programs

Name of Organization: Hoover Institution

Address: 1399 New York Avenue, NW Suite 500, Washington, D.C. 20005

Telephone Number: 202-760-3200

Fax Number: 202-760-3191

E-mail Address: mfranc@stanford.edu

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Stuart Family Congressional Fellowship Program

April 3-5, 2018

*Hoover Institution at Stanford University
Palo Alto, California*

Tuesday, April 3, 2018

7:50 AM: Depart DCA on United Airlines Flight 2042

11:00 AM: Arrive SFO, Shuttle to Lou Henry Hoover Building at Stanford University
Location: 580 Serra Mall, Stanford, CA 94305

12:30 – 1:00 PM: Welcome by Hoover Director Tom Gilligan and Lunch
Location: Annenberg Conference Room

1:00 – 2:00 PM: Bill Perry on nuclear weapons
Location: Annenberg Conference Room

2:00 – 3:00 PM: Abbas Milani on Iran
Location: Annenberg Conference Room

3:15 – 4:45 PM: Presentation of Hoover Library and Archives
Location: Tower 110 Classroom, Hoover Tower

4:45 – 6:00 PM: Break

6:00 – 9:00 PM: Dinner and Keynote Remarks by Mike McFaul on future of U.S.-Russia relations
Location: Stauffer Auditorium, Herbert Hoover Memorial Building

9:00 PM: Shuttle back to Stanford Guest House

Wednesday, April 4, 2018

All meetings will be held in: Annenberg Conference Room

Continental Breakfast @ hotel

Shuttle leaves hotel at 8:45am for Annenberg

9:30 – 11:00 AM: Herb Lin, Thomas Ilves, and Andrew Grotto on Cyber Policy and its Impacts
Location: Annenberg Conference Room

11:00 AM – 12:00 PM: John Taylor on the Federal Reserve & international impacts
Location: Annenberg Conference Room

12:00 – 1:00 PM: Lunch Keynote discussion with George Shultz moderated by Alice Hill
"Resilient Infrastructure in a Changing Climate"
Location: Annenberg Conference Room

1:00 – 2:15 PM: Tour of Hoover Tower & Traitel Building

2:15 – 3:30 PM: David Brady on 2018 midterm elections
Location: Annenberg Conference Room

3:30 – 3:45 PM: Break

3:45 – 5:00 PM: Kiron Skinner on Artificial Intelligence
Location: Annenberg Conference Room

5:00 – 5:30 PM: Break

5:30 – 6:00 PM: Shuttle to Restaurant

6:00 – 9:00 PM: Dinner and Keynote Remarks by Larry Diamond on threats to global democracy
Location: Stauffer Auditorium

8:30 – 9:30 PM: Shuttle to Stanford Guest House
Location: 2575 Sand Hill Rd, Menlo Park, CA 94025

Thursday, April 5, 2018

All meetings will be held in: Annenberg Conference Room

Continental Breakfast @ hotel

Shuttle leaves hotel at 8:45am for Annenberg

9:00 – 10:15 AM: Edward Lazear on a changing workforce
Location: Annenberg Conference Room

10:15 – 10:30 AM: Break

10:30 – 11:45 AM: Caroline Hoxby on educational policies for Congress
Location: Annenberg Conference Room

12:00 PM – 12:45 PM: Lunch
Location: Annenberg Conference Room- box lunch to go

12:45 PM: Shuttle Departs Campus for SFO

4:15 PM: Depart SFO on United Airlines Flight 517

12:15 AM: Arrive IAD

Last Name First Name

Donnelly	Kellie
Ellis	William
Nicholson	Ian
Oberan	Elizabeth
Polesovsky	Andrew
Popp	Monica
Saxon	Ethan
Soghoian	Christopher
Soifer	Halie
Wrase	Jeff

United States Senate

SELECT COMMITTEE ON ETHICS

March 22, 2018

Elizabeth Oberan
Office of Senator Mike Lee
United States Senate
Washington, DC 20510

Dear Ms. Oberan:

This responds to your recent correspondence concerning an invitation you received to travel to attend the *Hoover Institution's Stuart Family Congressional Fellowship Program* in Palo Alto, California on April 3-5, 2018, sponsored by the Hoover Institution (Hoover).¹ Hoover certified to the Select Committee on Ethics (the Committee) that it will pay the *necessary expenses*² related to the travel and that it is neither a lobbyist, nor lobbying firm, nor agent of a foreign principal, and it is not otherwise acting as a representative or agent of a foreign government. However, Hoover has certified that it is an organization designated under § 501(c)(3) of the Internal Revenue Code³ that retains or employs a registered lobbyist and that no registered lobbyist will accompany you at *any point throughout your trip*.⁴

Based on information and materials available to the Committee, and assuming the **actual** travel and travel-related expenses conform to the information and materials you provided, it appears that the proposed payment or reimbursement of necessary expenses for this trip **may be accepted** under relevant Senate Rules and the Committee's *Regulations and Guidelines for Privately-Sponsored Travel*, so long as at the time of the payment or reimbursement, Hoover is neither a registered lobbyist nor lobbying firm under the Lobbying Disclosure Act of 1995, nor an agent of a foreign principal under the Foreign Agents Registration Act (and is not otherwise acting as a representative or agent of a foreign government), and provided the travel and all required documents are disclosed to the Secretary of the Senate in accordance with the provisions of Senate Rules 34 and 35.

¹ Based on the information you submitted, the Committee understands that, for a personal purpose, you intend to extend your trip in California for more than two days after the conclusion of the officially related events. Because your proposed extension is longer than the sponsored trip itself, you must personally pay the full cost of your return transportation to Washington, D.C., as well as any other additional expenses incurred as a result of extending your trip.

² The term "necessary expenses" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

³ 26 U.S.C. § 501(c)(3).

⁴ The term "any point throughout your trip" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2.

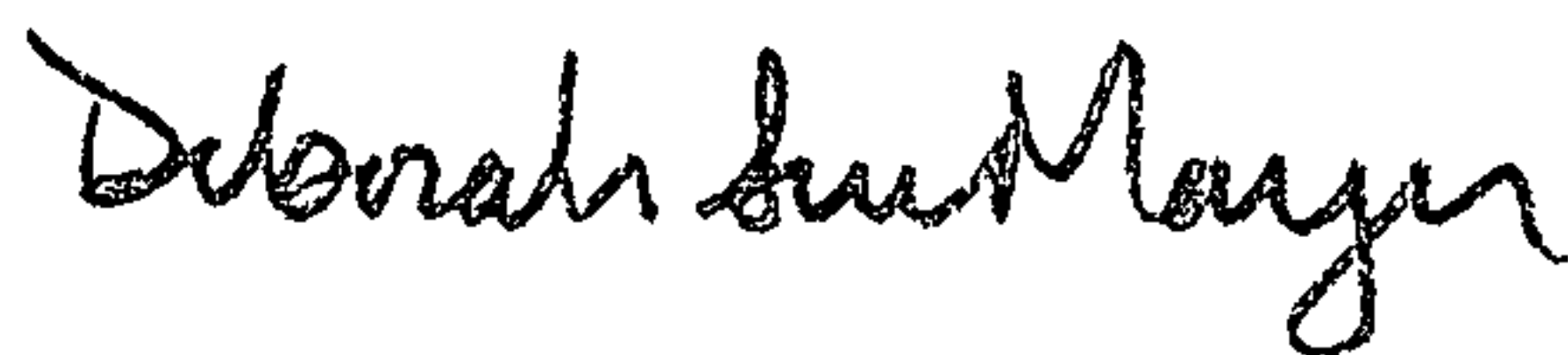
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Under Senate Rule 35, Senate staff must receive advance authorization⁵ signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel.**⁵

Finally, Senate Rule 34 requires a reporting individual,⁶ on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$390 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Deborah Sue Mayer
Chief Counsel and Staff Director

Enclosure: Travel Checklist

⁵ Trip extensions for any purpose do not extend this deadline.

⁶ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$126,148 for CY 2018) or is a political fund designee and is required to file Financial Disclosure Reports.